

Lori A. Reihl, Esq., Bar No. 246395
MORDAUNT, ROUNDY, REIHL & JIMERSON
A Professional Law Corporation
7488 Shoreline Drive, Suite B1
Stockton, CA 95219
Telephone: (209) 473-8732
Facsimile: (209) 957-9165
lreihl@mrrjlaw.com

Attorneys for Defendant
TARGET CORPORATION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Cherry Wardsworth,)	Case No. 2:22-cv-01772-DJC-DMC
)	
Plaintiff(s),)	STIPULATION REGARDING CASE DATES
)	AND DEADLINES AND ORDER
vs.)	
)	
Target Corporation; and DOES 1 to 20,)	
)	
Defendant(s).)	

Under the initial Pretrial Scheduling Order in this action (Docket No. 10), a jury trial was set for October 21, 2024 before District Judge Dale A. Drozd. The initial Pretrial Scheduling Order also set fact discovery, expert discovery, and motion deadlines.

Then, on April 6, 2023, this court issued an Order of Reassignment, ordering that this case was reassigned from District Judge Dale A. Drozd to District Judge Daniel J. Calabretta. That order stated that all pretrial conference and trial dates currently set were vacated and shall be reset, as necessary, by the reassigned Court. It was the parties' mutual understanding that the court's vacating of the trial dates in this matter, vacated all scheduled dates and deadlines in the prior Pretrial Scheduling order.

On September 22, 2023, this court issued a Minute Order, providing, "Due to the reassignment of this case to District Judge Daniel J. Calabretta, and on the Court's own motion, a Pretrial Conference is SET for 8/29/2024 at 1:30 PM and a Jury Trial is SET for 10/21/2024 at 9:00 AM, in Courtroom 10, both before District Judge Daniel J. Calabretta." (See Docket No. 15.) However, no new Scheduling Order has been issued in this case and the parties are currently

without an operative scheduling order in this matter. Further, disclosure deadlines had already passed on the prior scheduling order before the most recent order setting the current trial date in this matter.

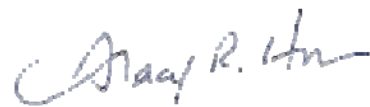
THEREFORE, it is hereby stipulated and agreed among the parties, through counsel, that that the case dates and deadlines in this matter shall be set as follows:

- All fact discovery shall be completed no later than **July 26, 2024**
- The parties shall disclose initial experts and produce reports in accordance with Federal Rule of Civil Procedure 26(a)(2) by no later than **March 28, 2024**. With regard to expert testimony intended solely for rebuttal, those experts shall be disclosed and reports produced in accordance with Federal Rule of Civil Procedure 26(a)(2) on or before **April 16, 2024**.
- All expert discovery shall be completed no later than **July 26, 2024**.
- All motions, except motions for continuances, temporary restraining orders, or other emergency applications, shall be served on or before **August 29, 2024**, and shall be noticed for hearing before Judge Calabretta on **October 3, 2024 at 1:30pm** in Courtroom 10, before District Judge Daniel J. Calabretta, in accordance with the timing requirements of Local Rules.
- The Pretrial Conference shall be continued to **December 12, 2024 at 1:30pm** in Courtroom 10, before District Judge Daniel J. Calabretta.
- The jury trial shall be continued to **February 10, 2025 at 9:00am** in Courtroom 10, before District Judge Daniel J. Calabretta.

Dated: February 2, 2025

TORKLAW

By:



Shelly Raiszadeh, Esq.
Tracy Horn, Esq.
Attorneys for Plaintiff
CHERRY WARDSWORTH

Dated: February 5, 2025

MORDAUNT, ROUNDY, REIHL & JIMERSON

By: /s/ Lori Reihl
Lori A. Reihl, Esq.
Attorneys for Defendant
TARGET CORPORATION

ORDER

Good cause having been shown,

IT IS HEREBY ORDERED that the case dates and deadlines in this matter shall be set as follows:

- All fact discovery shall be completed no later than **July 26, 2024**
- The parties shall disclose initial experts and produce reports in accordance with Federal Rule of Civil Procedure 26(a)(2) by no later than **March 28, 2024**. With regard to expert testimony intended solely for rebuttal, those experts shall be disclosed and reports produced in accordance with Federal Rule of Civil Procedure 26(a)(2) on or before **April 16, 2024**.
- All expert discovery shall be completed no later than **July 26, 2024**.
- All motions, except motions for continuances, temporary restraining orders, or other emergency applications, shall be served on or before **August 29, 2024**, and shall be noticed for hearing before Judge Calabretta on **October 3, 2024 at 1:30pm** in Courtroom 10, before District Judge Daniel J. Calabretta.
- The Pretrial Conference shall be continued to **December 12, 2024 at 1:30pm** in Courtroom 10, before District Judge Daniel J. Calabretta.
- The jury trial shall be continued to **February 10, 2025 at 9:00am** in Courtroom 10, before District Judge Daniel J. Calabretta.

Dated: February 6, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE